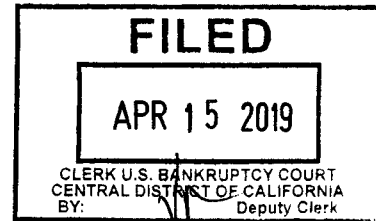


ORIGINAL

1 **RALPH E. SANDERS**
2 **1251 W. Bishop**
3 **Santa Ana, CA 92703**
4 **Telephone: (714) 262-8378**

5 Debtor/Defendant, in pro se



6 **UNITED STATES BANKRUPTCY COURT**
7 **CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION**

8
9 IN RE:

10 **RALPH E. SANDERS,**
11
12 **Debtor,**

13
14 **LARNITA PETTE,**
15 **Plaintiff,**

16
17 vs.

18 **RALPH E. SANDERS,**
19 **Defendant.**

Case No. 8:17-bk-10265-MW

Chapter 7

Adv. No. 8:17-AP-^{1068-MW}~~01068~~-MW

**DECLARATION OF RALPH
SANDERS IN SUPPORT OF MOTION
FOR JUDGMENT ON THE
PLEADINGS; EXHIBITS**

DATE: May 8, 2019
TIME: 9:00 A.M.
DEPT: 6135/6C
PLACE: 411 West Fourth Street
Santa Ana, CA 92701

20
21
22
23
24
25
26 **DECLARATION OF RALPH SANDERS**

1 I, RALPH SANDERS, declare as follows:

2 1. I am over the age of 18 years and am a party to this action. I have personal
3 knowledge of the facts stated in this declaration, and if called as a witness, could and would
4 testify competently to the truth of the facts as stated herein.
5

6 2. I make this declaration in support of my motion for judgment on the pleadings
7 against defendant Larnita Pette.
8

9 3. On March 28, 2019, I contacted the plaintiff, Larnita Pette, by email, and told
10 her that I was going to file a motion for summary judgment (I should have said a Motion For
11 Judgment on the Pleadings) and attached is the email exchange between myself and the
12 plaintiff as **Exhibit 1**.
13

14 4. I discussed and attempted to resolve the issues raised in this motion with the
15 plaintiff, Pette, in this case on March 28, 2019, and April 14, 2019, by text messages and
16 email (**Exhibit 2**). We were unable to reach a resolution.
17

18 5. I am entitled to a Judgment on the Pleadings in my favor on the grounds that
19 plaintiff cannot establish the existence of every element essential to all of her causes of action
20 and on which she bears the burden of proof at trial in that Larnita Pette filed her Amended
21 Complaint for nondischargeability of pending lawsuit pursuant to 11 U.S.C. § 523(a)(6)
22 and/or 11 U.S.C. 727(a)(4)(A)(B).
23

24 6. I respectfully request that the Court grant my motion and enter summary
25 judgment in my favor and against plaintiff on the grounds that there is no genuine dispute as
26
27
28

1 to any material fact and I am entitled to judgment as a matter of law.

2 I declare under penalty of perjury under the laws of the United States of America that
3 the foregoing is true and correct.
4

5
6 DATED: April 15, 2019



7 **RALPH E. SANDERS**, Declarant

EXHIBIT 1



Gregory Bosse <greg@lawbosse.com>

Fw: phone call

1 message

ralph sanders <resanders16@yahoo.com>

Sun, Apr 14, 2019 at 9:34 AM

Reply-To: ralph sanders <resanders16@yahoo.com>

To: Gregory Bosse <greg@lawbosse.com>

On Sunday, April 14, 2019 8:00 AM, ralph sanders <resanders16@yahoo.com> wrote:

Hello Ms. Pette,

I received your message. What is it that you would like to talk about please?

Blessings,

Ralph E



Gregory Bosse <greg@lawbosse.com>

Fw: Scanned document from HP ePrint user

4 messages

ralph sanders <resanders16@yahoo.com>

Thu, Mar 28, 2019 at 8:43 PM

Reply-To: ralph sanders <resanders16@yahoo.com>

To: Gregory Bosse <greg@lawbosse.com>

On Thursday, March 28, 2019 3:23 AM, ralph sanders <resanders16@yahoo.com> wrote:

Hello Ms, Pette,

I hope you are doing well.

I am writing you today under Bankruptcy rules to inform you that I plan to file a Motion for Summary Judgment. Here are my Undisputed Facts. Please feel free to email me with in regards to any concerns.

Sincerely,

Ralph Sanders

On Thursday, March 28, 2019 3:02 AM, "eprintcenter@hp.com" <eprintcenter@hp.com> wrote:

This email and attachment are sent on behalf of **resanders16@yahoo.com**.

If you do not want to receive this email in future, you may contact **resanders16@yahoo.com** directly or you may consult your email application for spam or junk email filtering options.

Regards,
HP Team



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428K

ralph sanders <resanders16@yahoo.com>

Fri, Mar 29, 2019 at 11:03 AM

Reply-To: ralph sanders <resanders16@yahoo.com>

To: Gregory Bosse <greg@lawbosse.com>

[Quoted text hidden]



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328K

On Thursday, March 28, 2019 3:23 AM, ralph sanders <resanders16@yahoo.com> wrote:

Hello Ms, Pette,
I hope you are doing well.
I am writing you today under Bankruptcy rules to inform you that I plan to file a Motion for Summary Judgment. Here are my Undisputed Facts. Please feel free to email me with in regards to any concerns.
Sincerely,
Ralph Sanders

[Quoted text hidden]

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428K

ralph sanders <resanders16@yahoo.com>
Reply-To: ralph sanders <resanders16@yahoo.com>
To: Gregory Bosse <greg@lawbosse.com>

Sat, Mar 30, 2019 at 3:14 PM

[Quoted text hidden]

 **filename-1.pdf**
214K

EXHIBIT 2



Gregory Bosse <greg@lawbosse.com>

Fw: motion for judgment

ralph sanders <resanders16@yahoo.com>

Sun, Apr 14, 2019 at 9:35 AM

Reply-To: ralph sanders <resanders16@yahoo.com>

To: Gregory Bosse <greg@lawbosse.com>

On Sunday, April 14, 2019 9:16 AM, ralph sanders <resanders16@yahoo.com> wrote:

Hello Ms Pette,

Do you have a solution to offer in regards to the Motion for Judgment or any comments?



Gregory Bosse <greg@lawbosse.com>

Fw: motion for judgment

ralph sanders <resanders16@yahoo.com>

Sun, Apr 14, 2019 at 1:07 PM

Reply-To: ralph sanders <resanders16@yahoo.com>

To: Gregory Bosse <greg@lawbosse.com>

On Sunday, April 14, 2019 10:52 AM, Larnita Pette <larnita.pette@gmail.com> wrote:

Mr. Sanders,

I will be filing an ex parte application with the court on April 15, 2019.

I will be asking the court (1) to have you sign and file sworn affidavit with the court stating that you had an attorney write your past and recent briefs, (2) ask you to identify the attorney who wrote the briefs and (3) have the person who wrote the briefs appear in court on the May 8, 2019 motion hearing and/or re-file the motion briefs with his signature on them

Do you object to the ex parte application? If so, please state why you are objecting so that I can give that information to the court.

Sincerely,

Larnita Pette
(707) 853-2049
larnita.pette
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